CLASS I-A APPLICATION REVIEW

FOR:

Newmont Mining Corporation – Gold Quarry Operations Area

Carlin, Nevada
Title V Facility-Wide Class 1 Operating Permit

Log Number 97AP0149

BY

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR POLLUTION CONTROL

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1.0 INTRODUCTION

Pursuant to Nevada Administrative Code (NAC) 445B.295, existing major sources (e.g. sources that emit over 100 tons per year of regulated air pollutants or 10 tons per year individual or 25 tons per year combined hazardous air pollutants) are required to submit applications for Class I-A Title V Air Quality Operating permits. In addition, contracted activities that support the primary activities of a major stationary source are also subject to the same requirements. The emissions from the support activities must also be included in the facility-wide emissions inventory and the emission units are required to have established permit limits and conditions.

On November 7, 1996, Newmont Mining Corporation (Newmont) of Denver, Colorado, submitted an application to the Nevada Division of Environmental Protection, Bureau of Air Pollution Control (NDEP-BAPC), requesting a Class I-A Title V Air Quality Operating Permit. The application was for a Class I Air Quality Operating Permit for the Gold Quarry Operations Area; subsequently designated by NDEP-BAPC as AP1041-0793 (partial Title V Operating Permit, issued 4/10/98), and AP1041-0404 (State of Nevada issued Class 1 Operating Permit). The incorporation of both Air Quality Operating Permits into one, facility-wide Air Quality Operating Permit will effectively complete the Class 1, Title V Facility Wide Air Quality Operating Permit for the Newmont Gold Quarry Operations Area.

Newmont is located off of State Route 766, (Interstate 80, exit 280); located approximately 6 miles Northwest of Carlin, Nevada. The facility's legal location is in Section 13, Township 33 & 34 North, Range 51 & 52 East, and Sections 19, 29, 30 and 32, Township 35 North, Range 50 & 51 East (UTM coordinates – North 4,515.00 kilometers, East 568.85 kilometers); **Hydrographic Area 51**. This area is designated as attainment for particulate matter and unclassified for all other criteria pollutants. The Standard Industrial Classification Code (SIC) for the mining of gold ore is 1041.

2.0 DESCRIPTION OF PROCESS

2.1 Mining Operations

Newmont mines oxide and refractory gold ore from open pits. Ore and waste rock are drilled and blasted in sequential batches to facilitate loading and hauling. Large, off-road haul trucks transport the ore and waste rock to waste rock disposal areas, heap leach pads, ore stockpiles, or to the mill site facilities. The designation of each load of rock depends on assay results of the rock sampled from each round of blast drilling.

2.2 Ore Processing Operations

Ore processing facilities at the Newmont Gold Quarry Operations Area provide recovery of gold from: high grade oxide ore (through milling), roasting and cyanide extraction, low grade oxide ore through cyanide heap leaching processes, and low grade refractory ore through bio-oxidation and cyanide or thiosulfate heap leaching processes. Fuel combustion units at the Gold Quarry Operations Area combust a mixture of natural gas/propane-air throughout the facility.

2.3 Ore Processing

2.3(1) Mill 5

Mill 5 employs crushing and grinding operations to generate a fine-ore sized particle. Oxide mill-grade ore is transferred from the open pit, or from stockpiles, to the primary crusher where the ore is reduced to a size of 6-inches or smaller. The crushed ore is then transferred via conveyors to the Mill 5 stockpiles, and then transferred once again to the mill where it is milled to further reduce the size. Prior to entering the grinding circuit, lime is added. During the grinding process, a solution of dilute sodium cyanide (NaCN) and water is added. The ground material is then screened to remove the course ore fraction, greater than 3/8-inch in size, which is subsequently returned to two secondary cone crushers for further size reduction. The crushed ore is then transferred back to the grinding circuit.

Dissolution of gold by cyanide solution in the milling circuit results in a gold-rich aqueous (pregnant) solution. Activate carbon contained in this circuit adsorbs the dissolved gold from solution. Carbon impregnated (or loaded) with gold is periodically removed from the circuit and transferred via pipeline to the stripping facility, where gold is separated from the carbon. (See the Carbon Handling section of this review)

2.0 DESCRIPTION OF PROCESS (Continued)

2.3 Ore Processing (Continued)

2.3(2) South Area Leach Ore Processing

Run-of-mine (ROM) oxide leach-grade ore is transferred via haul trucks to the South Area Leach Crushing Facility. As the ore is being crushed, cement and/or lime and water is added to agglomerate the fine gold-bearing ore particles that would have otherwise impeded the percolation of the dilute NaCN solution through the leach pad, after the solution is added. Crushed and agglomerated ore is conveyed to the leach ore stockpile and eventually hauled by trucks to the leach pads. Oxide ore can also be transferred directly to the leach pad, thereby bypassing the energy-intensive circuit.

At the leach pad, the ore is dumped and spread into lifts (or risers) on the pad. Once the ore is in place, a dilute NaCN solution is applied over the top of the heap by the use of continuous drip emitters or a sprinkler system. The leach solution percolates through the leach pile, forming soluble gold cyanide complexes that drain into a central collection point located at the bottom of the heap. The pregnant leach solution is then pumped into a series of columns filled with activated carbon. The gold selectively adsorbs onto the activated carbon. The gold-impregnated carbon is periodically removed and transported to the stripping facility for gold recovery and re-generation of the carbon.

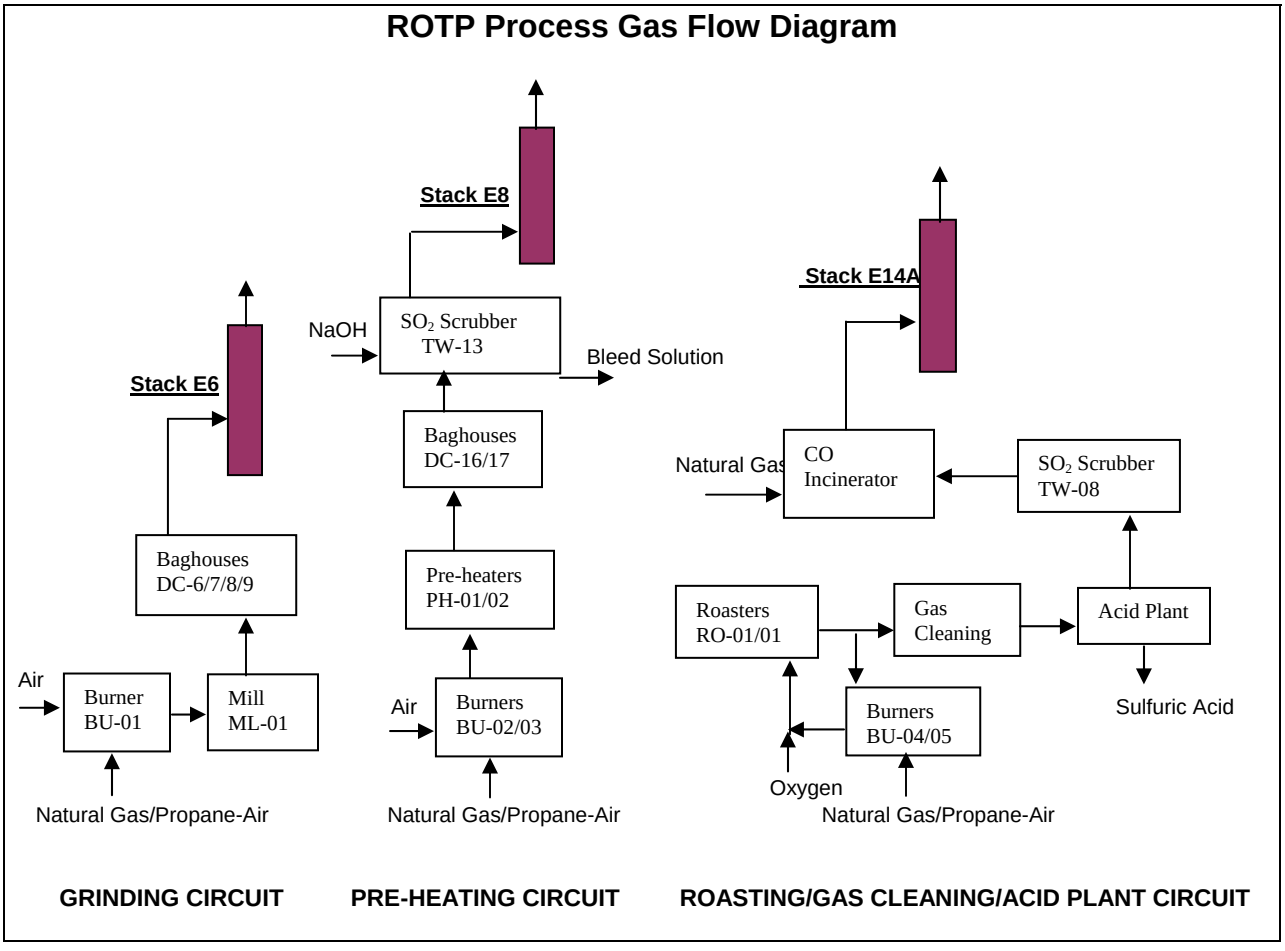
2.0 DESCRIPTION OF PROCESS (Continued)

2.3 Ore Processing (Continued)

2.3(3) Mill 6 Refractory Ore Treatment Plant

Newmont has been processing refractory gold ores by roasting since January 1995. The ores are classified as refractory due to the association of the gold with iron sulfides, namely pyrite and marcasite, and the presence of carbonaceous components, and are oxidized in an oxygen-enriched gaseous atmosphere. The treatment plant consists of primary and secondary crushing, dry grinding, ore pre-heating, circulating fluid bed roasting, heat recovery, gas cleaning, sulfuric acid production, and conventional carbon-in-leach cyanidation of the calcine product. In order to make the gold amenable to cyanide leaching, the sulfide and carbonaceous components in the ore must be oxidized at temperatures higher than 900 degrees F. Experimental research on oxidation of pyrite at elevated temperatures indicates that ignition does not start until the temperature is raised to 750 – 840 degrees F. The refractory ore treatment plant (ROTP) can be described as three circuits, Dry Grinding, Ore Pre-heating, and Roasting/Gas Cleaning/Acid Plant; each circuit with an individual emission stack.

ROTP Process Gas Flow Diagram



2.0 DESCRIPTION OF PROCESS (Continued)

2.3 Ore Processing (Continued)

2.3(3) Mill 6 Refractory Ore Treatment Plant

Grinding Circuit

Crushed ore is transferred to the mill (Ml-01) via two variable speed apron feeders and conveyor system. The mill consists of three sections: drying chamber, primary grinding chamber and secondary grinding chamber. The ore enters the drying chamber where it is dried by hot air, which is heated in a natural gas/propane-air chamber (BU-01). The course ore flows through the drying chamber into the primary grinding chamber. Ground ore from both the primary and secondary grinding chambers exits the mill and is classified. The fine product is transferred into a storage silo and the course fraction is recycled to the mill (some to secondary grinding and some to primary grinding).

The grinding circuit is operated under negative pressure and some fine particles generated in the mill are swept via air, through the discharge chamber and report to a cluster of four baghouses (DC-06 through DC-09). The captured solids are transferred to the storage silo and the clean air is discharged to the atmosphere via Stack E6.

To protect the filter bags in baghouses DC-06 through DC-09, the inlet air temperature is interlocked with burner BU-01. If the temperature reaches 240 degrees F, natural gas/propane-air mix addition to the burner automatically shuts off. Consequently, the grinding circuit is always operated at lower temperatures, which are far below the ignition temperature of the pyrite and carbonaceous components in the ore. Therefore, the main components of the exit gas are oxygen and nitrogen (from air), water vapor (from drying the ore) and natural gas/propane-air mixture combustion components.

2.0 DESCRIPTION OF PROCESS (Continued)

2.3 Ore Processing (Continued)

2.3(3) Mill 6 Refractory Ore Treatment Plant

Pre-heating Circuit

The pre-heating circuit consists of two, identical trains, each containing a natural gas/propane-air fired burner, an ore pre-heater, and a baghouse for emissions control. The finely ground ore is transported into each pre-heater (PH-01 andPH-02), where it is heated on a temperature typically in the range of 175 to 400 degrees F. For this purpose, ambient air is heated in a natural gas/propane-air fired burner (BU-02 and BU-03). The heated air enters the bottom of the pre-heater, exits through the top, and enters the baghouse (DC-16 and DC-17) for emissions control.

To protect the filter bags in baghouses DC-16 and DC-17, the inlet air temperature is interlocked with burner BU-02 and BU-03. If the temperature reaches 440 degrees F, natural gas/propane-air mix addition to the burner automatically shuts off. Consequently, the pre-heaters are always operated at temperatures far below the ignition temperature of the pyrite and carbonaceous components in the ore. However, the relative higher temperature in the pre-heaters, as compared to the grinding circuit, may result in minor oxidation of pyrite on the surface of the particle with the potential of generating small amounts of sulfur dioxide.

To eliminate the potential for sulfur dioxide emissions from the Pre-heating Circuit, gases from each train are combined and then passed through a sodium hydroxide scrubber (TW-13) before discharging to the atmosphere via Stack E8.

The scrubber system can be described as a two-step process in a single unit by the following reactions:

(1) $Na_2SO_3 + SO_2 + H_2O \rightarrow 2NaHSO_3$

(2) $NaOH + NaHSO_3 \rightarrow Na_2SO_3 + H_2O$

Overall: $NaOH + SO_2 \rightarrow NaHSO_3$

The pH of the scrubbing solution is maintained slightly acidic and tends to drop as the sulfur dioxide in the gas is neutralized. Consequently, a sodium hydroxide solution is automatically and continuously added to maintain a minimum pH of 5.3 and to assure neutralization of the sulfur dioxide. A small bleed stream exits the scrubbing tower automatically to maintain the level and conductivity of the scrubbing solution.

2.0 DESCRIPTION OF PROCESS (Continued)

2.3 Ore Processing (Continued)

2.3(3) Mill 6 Refractory Ore Treatment Plant

Pre-heating Circuit (Continued)

An extra precaution was taken to prevent excess emissions. The caustic solution flow to the venture and to the tower sprays is interlocked with the feed to both pre-heaters and the natural gas to the burners. Should both flows drop to 800 and 3,000 gallons per minute respectively, the feed to the pre-heaters and the natural gas/propane-air mix to the burners are automatically shut off. Like the gas exiting the Grinding Circuit, the main components of the exit gas from the Pre-heating Circuit are oxygen and nitrogen (from air), water vapor (from evaporation), natural gas/propane-air mixture combustion products and minor amounts of sulfur dioxide.

Roasting/Gas Cleaning/Acid Plant Circuit

The finely ground, pre-heated ore enters each roasting train (RO-01 and RO-02) where it is further heated to a temperature in excess of 900 degrees F. The heat of reaction from oxidation of pyrite and the carbonaceous components of the ore, as well as the hot gas entering through the bottom end of each roaster, sustain the roasting temperature. Before entering each roaster, the fluidizing gas is heated in a natural gas/propane-air fired burner (BU-04 and BU-05) and then mixed with oxygen to sustain the oxidation reactions. The following are the main reactions that take place in the roasters:

(3) $2FeS_2 + 5\ 1/2O_2 \rightarrow Fe_2O_3 + 4SO_2$
pyrite oxygen hermatite sulfur dioxide

(4) $S + O_2 \rightarrow SO_2$
sulfur oxygen sulfur dioxide

(5) $C + O_2 \rightarrow CO_2$
graphite oxygen carbon dioxide

(6) $C_xH_y + (x + y/4)O_2 \rightarrow xCO_2 + y/2H_2O$
organic carbon oxygen carbon dioxide water vapor

2.0 DESCRIPTION OF PROCESS (Continued)

Roasting/Gas Cleaning/Acid Plant Circuit (Continued)

Mineralogical studies identified the organic carbon as a type of hydrocarbon that can be represented as in equation (6), where carbon dioxide and water vapor are the main oxidation products. However, significant amounts of carbon monoxide exit the roasters in the off-gas. The dirty gases exiting each roaster pass through a waste heat boiler and an electrostatic precipitator where most of the carried dust is separated from the gas before combining into a single stream. This single stream passes through a wash tower before entering the acid plant for sulfuric acid production.

The sulfur dioxide in the roaster off-gas is converted to sulfur trioxide and then to sulfuric acid in a double contact – double adsorption plant. Conversion of sulfur dioxide to sulfuric acid is higher than 99.5 percent. Conversion of carbon monoxide to carbon dioxide in the acid plant typically ranges from 60 to 80 percent.

To assure compliance with the permit emission limits at all times, the spent gas from the acid plant passes through a scrubber (TW-08) to convert the remaining sulfur dioxide to sulfuric acid according to the following reaction:

(7) SO_2 + H_2O2 → H_2SO_4

sulfur dioxide hydrogen peroxide sulfuric acid

The concentration of sulfur dioxide in the gas that exits through the scrubbing tower (TW-08) is monitored and the hydrogen peroxide solution is automatically added to the circulating solution to maintain the desired level. The gas is finally passed through a regenerative thermal oxidizer (RTO, or carbon monoxide incinerator) to assure full compliance with carbon monoxide emissions. If the RTO goes down for any reason, the ore feed to the roasters is shut off because the organic carbon in the ore is the main source of carbon monoxide generation. The remaining clean gas exits to the atmosphere via Stack E14A. The main components of the exit gas from the Roasting Circuit are oxygen and nitrogen (from air), water vapor (from evaporation), carbon dioxide, natural gas/propane-air mixture combustion products and minor amounts of sulfur dioxide, carbon monoxide and nitrogen oxides.

2.3(4) Gold Quarry Bioleach Test Project

The Bioleach Test Project employs new technology in an effort to increase metal recovery from low-grade refractory gold ore. The Test Project is located on top of the existing Gold Quarry cyanide heap leach pad. ROM refractory gold ore is transferred from stockpile to the existing South Area Leach Crushing Facility. The sequence of the bio-leaching includes primary and secondary crushing at the South Area Leach Facility, loading of the bio-oxidation pad, bio-oxidizing the refractory ore, un-loading the bio-oxidation pad, neutralization and loading of the leach pad. The ore is transferred and discharged onto the pad via radial stacker or by trucks. The bacteria-rich laden leach solution is applied to the bio-oxidation pad to achieve optimum bacterial activity. Following bio-oxidation, portable conveyors are re-positioned to unload the pad and to transfer the ore to a lime neutralization mixer for pH adjustment and optimization, and then transferred and discharged to the cyanide heap leach.

2.3(5) Carbon Handling

The gold stripping/carbon handling facility consists of carbon stripping circuits and carbon regeneration kilns. Gold adsorbed onto the activated carbon is stripped from the carbon with an alkaline stripping solution. Carbon is re-activated in the carbon regeneration kilns and returned to the mill and leached gold recovery circuits.

2.3(6) Gold Refining

The gold refining circuit consists of an electro-winning circuit, retort furnaces and induction smelting furnaces. Gold contained in gold-bearing solutions, or electrolytes resulting from the stripping of activated carbon, is transferred to electro-winning cells, where the gold is plated onto steel wool. After the gold is plated onto the steel wool, it is recovered from the steel wool using acid digestion, then retorted to remove mercury and residual impurities. Following retorting, the gold is smelted and cast into gold dore bars for shipment.

2.0 DESCRIPTION OF PROCESS (Continued)

2.3 Ore Processing (Continued)

2.3(7) Assay Laboratory

The Gold Quarry assay laboratory provides analytical determinations from both solution and solid samples for planning and decision-making. Samples are brought to the laboratory from exploration sites, mines and process facilities. Solid samples are typically analyzed for gold content, amenability to various recovery methods and for carbon and sulfur content.

Sample preparation typically involves drying, crushing and grinding. Sample splits are mixed with fluxes and heated in fire assay furnaces to separate both gold and silver from the gangue material in the form of a small bead. The precious-metal bead is then dissolved in an aqua-regia solution and analyzed by atomic absorption for gold and silver content. The data generated from this process is used to define and delineate deposits, to classify the mine material and to provide input for ore processing, such as necessary grinding sizes.

2.3(8) Fuel Storage

The Gold Quarry facility has five, 50,000-gallon capacity fuel storage tanks: 1 Trim Fuel tank and 4 # 2 diesel fuel tanks. Trim fuel is a mix of methanol, kerosene and # 2 diesel fuel oil, and is used exclusively in the mill 6 Refractory Ore Treatment Plant Circuit to maintain optimal operating temperature.

2.3(9) Praxair Oxygen Plant

Praxair Inc. operates an oxygen plant at the Gold Quarry Facility that provides oxygen for the Refractory Ore Treatment Plant. The only pollutant-emitting activity associated with this oxygen plant is the regenerative boiler.

3.0 APPLICABLE REQUIREMENTS

Applicable requirements are those regulatory requirements that apply to a stationary source or to emission units contained within a stationary source. In the

Nevada air quality program, regulations governing the emissions of air pollutants from which the applicable requirements originate, are derived from four categories of regulations:

Nevada Revised Statutes (NRS)
Nevada Administrative Code (NAC)
Applicable State Implementation Plan (ASIP)
Code of Federal Regulations, Title 40 (40 CFR)

Definitions and applicability of the four categories of requirements, as well as any additional specific requirements applicable to the Newmont facility, can be found in following sections of this review.

3.1 GENERALLY APPLICABLE REQUIREMENTS

Within the four categories of regulations governing emissions of air pollutants in Nevada, there are many generally applicable requirements that apply to stationary sources and emission units located at a stationary source. All pertinent requirements have been reviewed and are included in the Newmont Title V, Air Quality Operating Permit.

3.2 SPECIFIC APPLICABLE REQUIREMENTS

The remainder of this section of the review will focus on specific applicable requirements associated with each emission unit or process system at the Newmont facility. A list of the emission units, as identified in the applications, and a summary of the specific applicable requirements are contained in Table 3.2.1. Applicability of each standard will be explained in the following sections.

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area

	EU #	System Description	Applicable Standards

System			NAC (445B)	SIP (445) (Article)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)
1	PF1.001 Thru PF1.005	Mill 5 Ore Receiving & Crushing Circuit	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
2	PF1.006 Thru PF1.008	Mill 5 Crushed Ore Transfer Circuit	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
3	S2.001 Thru S2.013	Mill 5 Ore Reclaim transfer to Crusher Circuit	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
4	S2.015	Chukar Underground Lime Silo Loading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
5	PF1.009 Thru PF1.013	South Area Primary Crusher Circuit	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
6	PF1.009 Thru PF1.012, S2.217	South Area Primary Crusher Circuit **(Alt. Op. Scenario)**	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
7	PF1.014	South Area Leach Transfer of Primary Crushed Ore	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

	EU #	System Description	Applicable Standards

System			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)
8	S2.218	South Area Leach Transfer of Primary Crushed Ore **(Alt. Op. Scenario)**	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
9	PF1.015	South Area Leach Transfer of Primary Crushed Ore (Shuttle Conveyor)	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
10	S2.219	South Area Leach Transfer of Primary Crushed Ore (Shuttle Conveyor) **(Alt. Op. Scenario)**	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
11	S2.015	South Area Leach Cement/Lime Silo Loading	305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
12	PF1.015	South Area Leach Cement/Lime Silo Un-Loading	305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
13	PF1.017 OR PF1.017.1	South Area Leach Transfer of Primary Crushed Ore to Secondary or Truck Load-out Stockpile	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
14	PF1.023 OR PF1.023.1	South Area Leach Transfer of Primary Crushed Ore to Tertiary or Truck Load-out Stockpile	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

	EU #	System Description	Applicable Standards

System			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)
15	S2.171 and S2.172	South Area Leach Tertiary Crushing Reclaim Transfer System	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
16	S2.173 and S2.174	South Area Leach Tertiary Crushing Reclaim Transfer System	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
17	S2.175 and S2.176	South Area Leach Secondary Crushing Reclaim Transfer System	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
18	S2.177 thru S2.185	Refractory Leach Project Secondary Screening/Crushing Circuit	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
19	S2.186	Refractory Leach Project Transfer of Secondary Ore System	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
20	S2.187 thru S2.200	Refractory Leach Project Tertiary Crushing Circuit	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
21	S2.201 Thru S2.203	Refractory Leach Project Crushed Ore Transfers (Collecting Conveyor)	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

	EU #	System Description	Applicable Standards

System			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)
22	S2.204	Refractory Leach Project Crushed Ore Transfer (Overland Conveyor)	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
23	S2.205 Thru S2.207	Refractory Leach Project Agglomeration Drums	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
24	PF1.025 Thru PF1.027	South Area Leach Truck Loading	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
25	S2.208 and S2.209	Refractory Leach Project Neutralization Lime Unloading System	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
26	S2.210	Mill 5 Lime Silo	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
27	S2.211 and S2.212	Refractory Leach Project Neutralization Area	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
28	S2.213	Refractory Leach Project Diatomaceous Earth Silo - Loading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

	EU #	System Description	Applicable Standards

System			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)
29	PF1.043	Refractory Leach Project Diatomaceous Earth Silo - Unloading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
30	S2.114 And S2.215	Refractory Leach Project Water Treatment Plant	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
31	S2.216	Refractory Leach Project Water Treatment Plant Silo - Loading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
32	PF1.044	Refractory Leach Project Water Treatment Plant Silo - Unloading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
33	PF1.028 thru PF1.033	Mill 6 Primary Crushing Circuit	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
34	S2.060 Thru S2.067	Mill 6 Secondary Crushing Circuit	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
35	PF1.034	Mill 6 Radial Stacker	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

	EU #	System Description	Applicable Standards

System			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)
36	S2.068 thru S2.082	Mill 6 Tertiary Crushing Circuit	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
37	S2.083	Mill 6 Lime/Trona Bin Loading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
38	S2.084	Mill 6 Crushed Ore Transfer	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
39	S2.085 thru S2.097	Mill 6 Grinding and Ore Recirculation	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
40	S2.098 Thru S2.101	Mill 6 Dynamic Separator Baghouses	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
41	S2.102 Thru S2.119	Mill 6 Transfers to Fine Ore Bin and Roaster Day Bins	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
42	S2.120 Thru S2.124	Mill 6 Static Separator	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

System	EU #	System Description	Applicable Standards					
			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)

43	S2.125 Thru S2.130	North/South CFB Preheaters	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
44	S2.131 And S2.156	North/South Roasters RTO	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
45	S2.157	Acid Plant Heater	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
46	S2.401	ROTP/Mill 6 Cooling Tower	.305 .3405 .22017	.721 .732	N/A	N/A	N/A	N/A
47	S2.158 And S2.159	North Calcine Quench Normal Ops.	.305 .3405 .22017	.721 .732	N/A	N/A	N/A	N/A
48	S2.158A And S2.159A	North Calcine Quench Maintenance Conditions # 1	.305 .3405 .22017	.721 .732	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

System	EU #	System Description	Applicable Standards					
			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)

49	S2.158B And S2.159B	North Calcine Quench Maintenance Conditions # 2	.305 .3405 .22017	.721 .732	N/A	N/A	N/A	N/A
50	S2.158C And S2.159C	North Calcine Quench Maintenance Conditions # 3	.305 .3405 .22017	.721 .732	N/A	N/A	N/A	N/A
51	S2.160 And S2.161	South Calcine Quench Normal Ops.	.305 .3405 .22017	.721 .732	N/A	N/A	N/A	N/A
52	S2.160A And S2.161A	South Calcine Quench Maintenance Conditions # 1	.305 .3405 .22017	.721 .732	N/A	N/A	N/A	N/A
53	S2.160B And S2.161B	South Calcine Quench Maintenance Conditions # 2	.305 .3405 .22017	.721 .732	N/A	N/A	N/A	N/A
54	S2.160C And S2.161C	South Calcine Quench Maintenance Conditions # 3	.305 .3405 .22017	.721 .732	N/A	N/A	N/A	N/A
55	S2.162	Mill 6 Lime Storage Silo - Loading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

System	EU #	System Description	Applicable Standards					
			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)

56	S2.163	CFB North Roaster Lime Bin - Loading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
57	S2.164	CFB South Roaster Lime Bin - Loading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
58	S2.165	CFB North Roaster Preheater	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
59	S2.166	CFB South Roaster Preheater	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
60	S2.167 and S2.168	Liquid Sulfur/Acid Tank Heaters	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
61	PF1.035	Bioleach Test Project Mixer	.305 .3405 .22017 .22033	.721 .732	(Subpart LL) 60.7 60.11 60.380 60.382	N/A	N/A	N/A
62	S2.169	Bioleach Test Project Silo - Loading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

System	EU #	System Description	Applicable Standards					
			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)

63	PF1.036	Bioleach Test Project Silo - Unloading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
64	S2.170	Bioleach Test Project Silo - Loading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
65	PF1.037	Bioleach Test Project Silo - Unloading	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
66	S2.050	Carbon Stripper Boiler #1	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
67	S2.051	Carbon Stripper Boiler #2	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
68	S2.052	Carbon Stripper Boiler #3	.305 .3405 .22017 .22033	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
69	S2.053	Carbon Stripper Boiler #4	.305 .3405 .22017 .22033	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

System	EU #	System Description	Applicable Standards					
			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)

70	S2.054	Carbon Stripper Boiler #5	.305 .3405 .22017 .22033	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
71	S2.056	Carbon Stripper Boiler #6	.305 .3405 .22017 .22033	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
72	S2.056 And S2.057	Carbon Regeneration Kiln #1	.305 .3405 .22017 .22033	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
73	S2.058 And S2.059	Carbon Regeneration Kiln #2	.305 .3405 .22017 .22033	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
74	S2.171	Propane Vaporizer 1	.305 .3405 .22017 .2203 .22047	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
75	S2.172	Propane Vaporizer 2	.305 .3405 .22017 .22033	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A
76	S2.173	Propane Vaporizer 3	.305 .3405 .22017 .22033	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

System	EU #	System Description	Applicable Standards					
			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)

77	S2.041 Thru S2.046.2	Refinery Mercury Retort	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
78	S2.047 Thru S2.049	Electric Refinery Induction Furnaces	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
79	S2.036 And S2.037	Integrated Lab Crushing System # 1	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
80	S2.038 thru S2.039B	Integrated Lab Crushing System # 2	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
81	S2.040	Lab Flux Mixer	.305 .3405 .22017 .22033	.721 .732	N/A	N/A	N/A	N/A
82	PF1.038	Trim Fuel Storage Tank	.305 .3405	N/A	N/A	N/A	N/A	N/A
83	PF1.039 Thru PF1.042	Diesel Fuel Storage Tanks	.305 .3405	N/A	N/A	N/A	N/A	N/A

TABLE 3.2.1 – List of Emission Units and Associated **Specific Applicable Standards** for the Title V, Class I Air Quality Operating Permit for the Newmont Gold Quarry Operations Area (Continued)

System	EU #	System Description	Applicable Standards					
			NAC (445B)	SIP (Article) (445)	NSPS (40 CFR Part 60)	NESHAPS (Parts 61, 63)	PSD (Part 52)	Acid Rain (Parts 72-78)

84	S2.400	Oxygen Plant Heater	.305 .3405 .22017 .22033	.721 .731 Article 8.2.1.1	N/A	N/A	N/A	N/A

3.0 APPLICABLE REQUIREMENTS (Continued)

3.2.2 NEVADA REVISED STATUTES

The Nevada Revised Statutes (NRS) is the statutory authority for the adoption and implementation of administrative regulations. The statutes relating to the control of

air pollution are contained in NRS 445B.100 through 445B.640. The NRS specifies that the State Environmental Commission is the governing body given the power to adopt administrative regulations. Because the NRS is the enabling statutory authority, very few specific requirements are contained in the statutes. Rather, the NRS provides, generally, broad authority for the adoption and implementation of air pollution control regulations.

3.2.3 NEVADA ADMINISTRATIVE CODE

The Nevada Administrative Codes (NAC) for air quality are administrative regulations that contain specific requirements relating to the control of air pollution. The State Environmental Commission adopts these regulations. The NAC requires that, where state regulations are more stringent in comparison to Federal regulations, the State regulations are applicable. The NAC sets forth, by rule, maximum emission standards for visible emissions (opacity), PM_{10} and sulfur emitting processes. The maximum allowable sulfur emissions are based on a maximum heat input of the operation in millions of BTU's per hour, whereas the maximum allowable PM_{10} emissions are based on a maximum material throughput rate. Other requirements are established for incinerators, storage tanks, odors and maximum concentrations of regulated air pollutants in the ambient air. Still other NAC regulations specify the requirements for applying for and method of processing applications for operating permits. All of the equipment considered in this application must meet, at a minimum, the applicable standards and requirements set forth in the NAC.

3.0 APPLICABLE REQUIREMENTS (Continued)

3.2.4 NEVADA APPLICABLE SIP (ASIP)

The Applicable State Implementation Plan (ASIP) is a document prepared by a State or Local air regulatory agency. Federal regulations require this plan to be

submitted to the U.S. EPA for approval. Title I of the federal Clean Air Act is the statutory authority for the U.S. EPA regulations that require a State to submit a SIP. The contents of the SIP are intended to show how a State, through the implementation and enforcement of the provisions contained in the SIP, will either show how attainment of the national ambient air quality standards (NAAQS) will be achieved or how a State will continue to maintain compliance with the NAAQS. Nevada's most recent ASIP, which was approved by U.S. EPA, is based on State regulations codified in 1982. In general, the regulations contained in the ASIP closely parallel the current NAC regulations. However, because the ASIP is based on older air quality regulations (at this time), compliance with all of the current NAC regulatory requirements does not necessarily ensure compliance with the ASIP requirements. All of the equipment considered in this application must also meet, at a minimum, the standards set forth in the ASIP.

3.2.5 CODE OF FEDERAL REGULATIONS (CFR)

The Code of Federal Regulations (CFR) are regulations adopted by the U.S. EPA and published in the Federal Register pursuant to the authority granted by Congress in the Clean Air Act. The CFR addresses multiple aspects, including but not limited to, permitting requirements, performance standards, testing methods, and monitoring requirements.

3.2.5.1 New Source Performance Standards (NSPS)

The U.S. EPA has promulgated maximum emission standards and/or monitoring/recordkeeping methods for selected source categories. These standards are contained in Title 40 of the CFR, Part 60, and are known as the New Source Performance Standards (NSPS). The NSPS are considered the maximum emissions that may be emitted from a source, unless the NAC or PSD provisions are more stringent. Numerous, but not all, of the emission units in operation at the Newmont facility are subject to the NSPS (Subpart - LL, 40 CFR Part 60.380 - Standards of Performance for Metallic Mineral Processing Plants).

3.0 APPLICABLE REQUIREMENTS (Continued)

3.2.5.2 National Emission Standards for Hazardous Air Pollutants (NESHAP)

The federal NESHAP requirements are found in two parts of the 40 CFR: Part 61 and Part 63. Part 63 contains the provisions for maximum achievable control technology (MACT) requirements for various source categories. Attachment 1 contains

the Newmont facility's emissions calculations, which quantify regulated pollutants, but do not quantify HAP pollutants. On June 30, 2003, Newmont submitted a letter to the BAPC formally withdrawing any contention that the Gold Quarry Facility is a minor source of HAP's.

3.2.6 Prevention Of Significant Deterioration Regulations (PSD)

As required by the Clean Air Act, all new major stationary sources and all major modifications to new and existing major stationary sources are required to obtain an operating permit prior to commencement of construction. This process is required whether the major source or major modification is planned in a non-attainment area, an attainment area, or an unclassified area. The review process is termed New Source Review (NSR) and the operating permits for attainment or unclassified areas are referred to as Prevention of Significant Deterioration (PSD) permits, while operating permits for non-attainment areas are referred to as non-attainment area (NAA) permits.

The PSD regulations implemented by the State of Nevada are contained in 40 CFR Part 52.21. These regulations specify federally required permitting procedures for a "major stationary source" located in an attainment or unclassifiable area. The PSD regulations define a "stationary source" as "*any building, structure, facility, or installation which emits or may emit any air pollutant subject to regulation under the Act.*" A "building structure facility or installation" is defined as "*all of the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control) except the activities of any vessel. Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same 'Major Group' (i.e., which have the same first two digit code) as described in the Standard Industrial Classification Manual, 1972, as amended by the 1977 Supplement.*"

3.0 APPLICABLE REQUIREMENTS (Continued)

3.2.6 Prevention Of Significant Deterioration Regulations (PSD) (Continued)

The PSD regulations also specify two major stationary source applicability

thresholds (40 CFR 52.21(b)(1)). The first threshold is for a stationary source that emits or has the potential to emit 100 tons per year or more of any pollutant regulated under the act and **is defined as one of 28 specific categories of sources** (see 40 CFR 52.21(b)(1)(i)(a)). The other applicability threshold is for any other stationary source that emits or has the potential to emit 250 tons per year or more of any pollutant regulated under the act (see 40 CFR 52.21(b)(1)(i)(b)).

The SIC code for this facility is 1041 (Gold Ore). Metallic Mineral manufacturing plants **are not** one of the 28 specific categories of sources. Therefore, major source status is classified at the 250 tons per year emission threshold for any pollutant regulated under the Act.

The current, existing facility-wide emissions for the Gold Quarry facility can be found in the emissions inventory located in Attachment 1. Future permits for this facility will be reviewed as PSD Permits if emission increases from future modifications are greater than the significant emissions thresholds as outlined in 40 CFR 52.21.

3.0 APPLICABLE REQUIREMENTS (Continued)

3.2.7 Compliance Assurance Monitoring (CAM)

The U.S. EPA has promulgated requirements for sources to provide detailed monitoring plans that will ensure compliance with all applicable requirements and are

contained in 40 CFR Part 64. Section 64.2 specifies that these monitoring requirements apply to a "pollutant specific emission unit at a major source" if all of the following are satisfied:

* The unit is subject to an emission limitation or standard;
* The unit uses a control device to achieve compliance with any such emission limitation or standard; and
* The unit has potential pre-control device (uncontrolled) emissions equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

The key factors which will qualify a facility for CAM plan submittal are: 1) the facility must be defined as a “major source”; and 2) the units must be subject to an emission limitation or standard (acid rain limitations and standards are not included).

Newmont’s Gold Quarry facility does have emission units with potential uncontrolled emissions equal to or greater than 100% of the amount, in tons per year, required for a source to be classified as a major source, and thereby, a CAM plan will be required to be submitted upon renewal of the operating permit.

3.2.8 Acid Rain

The Newmont Gold Quarry facility currently does not operate any emission unit(s) subject to the acid rain provisions.

3.0 APPLICABLE REQUIREMENTS (Continued)

3.3 CLASS I (Title V) REQUIREMENTS

This application is being processed pursuant to Nevada's Class I permitting program. Nevada's Class I operating permit program requirements are intended to apply to those sources that would be required to obtain an operating permit under the requirements of Title V of the Clean Air Act. NAC 445B.337 specifies, in part, that:

> An owner or operator of a stationary source must file a Class I-A application and obtain a Class I operating permit for:
>
> 1. An existing major source;
> 2. An existing major source subject to a standard, a limitation or any other requirement adopted pursuant to 42 U.S.C. § 7411 or 7412,
> 3. An existing major source in a category of sources designated by the administrator pursuant to 42 U.S.C. § 7661a(a);

NAC 445B.094 defines major source as follows (in part):

1. …"major source" means any stationary source that:
   (a) Is located on one or more contiguous or adjacent properties;
   (b) Is under the common control of the same person or persons;
   (c) Belongs to a single major industrial grouping as described in the *Standard Industrial Classification Manual*, as incorporated by reference in NAC 445B.221; and
   (d) Meets one of the following conditions:
      (1) Is located in a non-attainment area and is required to obtain an operating permit pursuant to 42 U.S.C. §§ 7501 to 7515, inclusive;
      (2) Directly emits or has the potential to emit:
         (I) One hundred tons per year or more of any regulated air pollutant, excluding particulate matter more than 10 microns in diameter; or
         (II) Ten tons per year or more of a hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants or a lesser quantity as established by the commission; …

Therefore, this facility is subject to Class I permitting requirements based on the potential to emit of regulated, criteria pollutants is greater than 100 ST/year for the following pollutants, .

4.0 EMISSIONS INVENTORY

Regulated pollutant emission estimates were obtained from previously submitted

permit applications and permit technical reviews. All potential emissions are based on an operating schedule of 24-hours per day, 8760 hours per year, unless otherwise noted.

Individual emission calculations and emission factor references are contained in Attachment 1. Table 4.1 documents potential criteria pollutant annual emissions for the Gold Quarry facility.

Table 4.1

Pollutant	PM-10	NOx	SO_2	CO	VOC's
Annual Emissions Tons/year	429.93	272.19	223.80	200.74	40.73

5.0 AIR QUALITY IMPACTS

The purpose of the air quality analysis is to demonstrate that the emissions from the stationary source will not cause or contribute to a violation of any applicable federal or state ambient air quality standards prior to the issuance of an operating permit.

Ambient air quality modeling was **NOT** performed for this facility-wide Title V, Class 1 Draft Air Quality Operating Permit application. It is the NDEP-BAPC's policy to require the facility to perform a comprehensive, facility-wide air dispersion modeling analysis upon renewal of this Title V, Class 1 Air Quality Operating Permit.

7.0 CONCLUSIONS / RECOMMENDATIONS

Based on the above review and supporting data and analyses, Newmont's request for a Class I, Title V Facility-wide Air Quality Operating Permit for the Gold Quarry Operations Area will not violate any applicable requirements. As a result, I

recommend that the proposed operating permit be issued.

Rod Moore Date
Staff Engineer, Permitting Branch

Mehrdad Moghimi Date
Supervisor, Permitting Branch

Attachment (1) Emissions Inventory
Attachment (2) Proposed Operating Permit

Attachment 1

Emissions Inventory

Attachment 2

Proposed Operating Permit